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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

True Names, Ltd. d/b/a Ethereum Name
Service, a Singapore corporation, and Virgil
Griffith, an individual

Plaintiff,

v.

GoDaddy, Inc., a Delaware corporation,
and GoDaddy.com LLC, a Delaware
corporation, Dynadot LLC, a California
corporation, and Manifold Finance, Inc., a
Delaware corporation.

Defendants.

Case No. 2:22-cv-01494-JJT

**DECLARATION OF JACOB CANTER
REGARDING NOTICE TO
DEFENDANTS AND COMPLIANCE
WITH THE COURT'S SEPTEMBER
6, 2022 ORDER**

I, Jacob Canter, declare:

1. I am a lawyer at Crowell & Moring LLP and counsel to Plaintiffs True Names, Ltd. and Virgil Griffith. The matters set forth herein are true and correct of my own personal knowledge and, if called as a witness, I could and would testify competently thereto. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

2. On September 6, 2022, the Court ordered Plaintiffs to (1) "serve the remaining Defendants [other than Manifold Finance, Inc.] with the Complaint (Doc. 1), Summons, and TRO Motion (Doc. 2), and file certificates of service on the docket for all

four Defendants, by **September 7, 2022**” and (2) “provide a copy of this Order to a verified contact at each Defendant (or each Defendant’s counsel) by **September 7, 2022**.”

3. Plaintiffs have complied with the Court’s directive by serving the Complaint, Summons, TRO Motion, and September 6, 2022 Order on each of the Defendants by no later than September 7, 2022. In addition, to ensure that Defendants are on notice of this action and the Court’s September 6, 2022, Order, Plaintiffs have also served the same materials on the headquarters for GoDaddy, Inc. and GoDaddy.com LLC and on over two-dozen email addresses associated with persons at Dynadot LLC based on public records searches.

4. Plaintiffs have also complied with the Court’s directive by filing certificates of service on the docket for all four Defendants. *See* Dkt. Nos. 12-15. Additional proof of service that has been provided to me since filing the certificates of service are attached as exhibits to this declaration.

5. Plaintiffs have also complied with the Court’s directive by providing a copy of the Court’s September 6, 2022, Order to verified contacts at each address. As we have received no communications from any of the Defendants, the verified contacts were, as described herein, the corporate agents that accepted service of the Order.

Compliance with the Court’s Order Regarding Defendant Manifold Finance, Inc.

6. On September 6, 2022, I directed the process server to serve the Complaint, Summons, and TRO Motion on Manifold Finance, Inc. at the registered agent site, 651 N. Broad St., Suite 201, Middletown DE, 19709.

7. On September 6, 2022, I received from the process server confirmation in the form of an affidavit that service of the Complaint, Summons, and TRO Motion on Manifold Finance, Inc. had been completed on September 6, 2022, at 2:12 PM. (Dkt. No. 12 at 3).¹

¹ I confirmed with the process serving agency that, while time zones are not reflected on the affidavits, the time listed is based on the time zone where the service occurred (i.e., eastern time zone in Delaware, pacific time zone in California, and mountain standard time zone in Arizona).

1 8. On September 7, 2022, I directed the process server to serve the Court's
2 September 6, 2022, Order on Manifold Finance, Inc. at the registered agent site, 651 N.
3 Broad St., Suite 201, Middletown DE, 19709.

4 9. On September 7, 2022, I received email confirmation from the process
5 server that service of the Court's September 6, 2022, Order on Manifold Finance, Inc.
6 had been completed. (Dkt. No. 12 at 6-7).

7 10. On September 8, 2022, I received from the process server confirmation in
8 the form of an affidavit that service of the Court's September 6, 2022, Order on Manifold
9 Finance, Inc. had been completed at the registered agent site on September 7, 2022, at
10 2:02 PM. (Ex. A at 1).

11 **Compliance with the Court's Order Regarding Defendant GoDaddy, Inc.**

12 11. On September 6, 2022, I directed the process server to serve the Complaint,
13 Summons, and TRO Motion on GoDaddy, Inc. at the registered agent site, 251 Little
14 Falls Drive, Wilmington DE, 19808.

15 12. On September 7, 2022, I directed the process server to serve the Court's
16 September 6, 2022, Order on GoDaddy, Inc. at the registered agent site, 251 Little Falls
17 Drive, Wilmington DE, 19808.

18 13. On September 7, 2022, I directed the process server to serve the Complaint,
19 Summons, TRO Motion, and the Court's September 6, 2022, Order on GoDaddy, Inc. at
20 the company headquarters, which I identified based on information from the company's
21 official website, <https://www.godaddy.com>, 2155 E GoDaddy Way, Tempe AZ, 85284.

22 14. On September 7, 2022, I received from the process server confirmation in
23 the form of an affidavit that service of the Complaint, Summons, and TRO Motion on
24 GoDaddy, Inc. had been completed on the registered agent site on September 6, 2022 at
25 3:26 PM. (Dkt. No. 14 at 3).

26 15. On September 7, 2022, I received from the process server verified
27 confirmation that service of the Court's September 7, 2022, Order on GoDaddy, Inc. had
28 been completed on the registered agent site at 2:37 PM. (Dkt. No. 14 at 6-7).

16. On September 7, 2022, I received verified confirmation that service of the Complaint, Summons, TRO Motion, and the Court's September 6, 2022, Order on GoDaddy, Inc. had been completed on the company headquarters on September 7, 2022, at 10:44 AM. (Dkt. No. 14 at 8-9).

17. On September 8, 2022, I received from the process server confirmation in the form of an affidavit that service of the Court's September 6, 2022, Order on GoDaddy, Inc. had been completed on the registered agent site on September 7, 2022, at 2:37 PM. (Ex. B at 1).

Compliance with the Court's Order Regarding Defendant GoDaddy.com LLC²

18. On September 6, 2022, I directed the process server to serve the Complaint, Summons, and TRO Motion on GoDaddy.com LLC at the registered agent site, 251 Little Falls Drive, Wilmington DE, 19808.

19. On September 7, 2022, I directed the process server to serve the Court's September 6, 2022, Order on GoDaddy.com LLC at the registered agent site, 251 Little Falls Drive, Wilmington DE, 19808.

20. On September 7, 2022, I directed the process server to serve the Complaint, Summons, TRO Motion, and the Court's September 6, 2022, Order on GoDaddy.com LLC at the company headquarters, which I identified based on information from the company's official website, <https://www.godaddy.com>, 2155 E GoDaddy Way, Tempe AZ, 85284.

21. On September 7, 2022, I received from the process server confirmation in the form of an affidavit that service of the Complaint, Summons, and TRO Motion on GoDaddy.com LLC had been completed on the registered agent site on September 6, 2022 at 3:26 PM. (Dkt No. 13 at 3).

² Dkt No. 13 at 6-7 erroneously includes verified confirmation of service of the September 6, 2022, Order on GoDaddy, Inc., not GoDaddy.com LLC. As described herein, the September 6, 2022, Order was served on GoDaddy.com LLC at the company headquarters (Dkt. No. 13 at 8-9) and via certified mail at the registered agent site (Dkt. No. 16-3 (Exhibit C)).

1 22. On September 7, 2022, I received from the process server verified
2 confirmation that service of the Complaint, Summons, TRO Motion, and the Court's
3 September 6, 2022, Order on GoDaddy.com LLC had been completed on the company
4 headquarters on September 7, 2022, at 10:44 AM. (Dkt. No. 13 at 8-9).

5 23. On September 8, 2022, I received from the process server confirmation in
6 the form of an affidavit that service of the Court's September 6, 2022, Order on
7 GoDaddy.com LLC had been completed via certified mail on the registered agent site on
8 September 7, 2022, at 2:37 PM. (Ex. C at 1).

9 24. On September 8, 2022, I received from the process server confirmation in
10 the form of an affidavit that service of the Complaint, Summons, TRO Motion, and the
11 Court's September 6, 2022, Order on GoDaddy.com LLC had been completed on the
12 company headquarters on September 7, 2022, at 10:44 AM. (Ex. D at 1).

13 **Compliance with the Court's Order Regarding Defendant Dynadot LLC**

14 25. On September 6, 2022, I directed the process server to serve the Complaint,
15 Summons, and TRO Motion on Dynadot LLC at the location listed on the California
16 Secretary of State's website as most recently associated with the company's agent, 210
17 S Ellsworth Ave., Unit 345, San Mateo, CA 94401.

18 26. On September 7, 2022, I directed the process server to serve the Court's
19 September 6, 2022, Order on Dynadot LLC at the location listed on the California
20 Secretary of State's website as most recently associated with the company's agent, 210
21 S Ellsworth Ave., Unit 345, San Mateo, CA 94401.

22 27. On September 7, 2022, I directed the process server to serve the Complaint,
23 Summons, TRO Motion, and the Court's September 6, 2022, Order on Dynadot LLC at
24 the other location listed on the California Secretary of State's website as associated with
25 the company's agent, 205 E. 3rd Ave., Suite 314, San Mateo, CA 94401.

26 28. On September 7, 2022, I directed the process server to serve the Complaint,
27 Summons, TRO Motion, and the Court's September 6, 2022, Order on Dynadot LLC at
28 the home address most recently associated with the company's agent and CEO, Todd

1 Han, which I identified based on public records searches. I am prepared, at the Court's
2 direction, to provide the personal home address to the Court under seal, to protect the
3 individual's privacy.

4 29. On September 7, 2022, I directed the process server to server the
5 Complaint, Summons, TRO Motion, and the Court's September 6, 2022, Order on
6 Dynadot LLC via certified mail, with return receipt requested, at the following addresses:
7 210 S Ellsworth Ave., Unite 345, San Mateo, CA 94401, and PO BOX 607 San Mateo,
8 CA, 94401.

9 30. On September 7, 2022, I had public records searches completed to identify
10 the email addresses of all persons associated with Dynadot LLC, located in or around San
11 Mateo, CA.

12 31. Based on this investigation, I identified forty-four email addresses for
13 persons potentially associated with Dynadot LLC. The nine email addresses that include
14 an @dynadot domain are: jacqueline.daly@dynadot.com; lburgess@dynadot.com;
15 ccastro@dynadot.com; bmckay@dynadot.com; christinec@dynadot.com;
16 christine@dynadot.com; todd@dynadot.com; tony.huang@dynadot.com;
17 kathryn@dynadot.com. I am prepared, at the Court's direction, to provide the remaining
18 thirty-five personal email addresses to the Court under seal, to protect the privacy of the
19 individual's associated with the personal addresses.

20 32. On September 7, 2022, I served via email to each of forty-four addresses
21 the Complaint, Summons, TRO Motion, and the Court's September 6, 2022, Order. The
22 emails failed to deliver to eighteen of the personal addresses. Email service was
23 successful on the remaining accounts.

24 33. I initially attempted to serve via a single email all of the materials to each
25 of the @dynadot addresses, but I received a bounce-back notification that the file was too
26 large. Thus, I served the materials on each of the @dynadot addresses via email in two
27 parts (two separate emails), with the Court's September 6, 2022 Order, included in both
28 emails. I have received no bounce-back notification after serving the materials in two
parts to the @dynadot addresses.

1 34. On September 7, 2022, I received from the process server verified
2 confirmation that service of the Complaint, Summons, TRO Motion, and the Court's
3 September 6, 2022, Order had been completed in-person at one of the sites listed on the
4 California Secretary of State's website as associated with the company's agent, 205 E,
5 3rd Avenue, Suite 314, San Mateo CA, 94401, on September 7, 2022, at 2:30 PM. (Dkt.
6 No. 15 at 3-4).

7 35. On September 7, 2022, I received from the process server verified
8 confirmation that service of the Complaint, Summons, TRO Motion, and the Court's
9 September 6, 2022, Order had been completed via certified mail on the following
10 addresses: 210 S Ellsworth Ave., Unit 345, San Mateo, CA 94401 and PO BOX 607 San
11 Mateo, CA, 94401, on September 7, 2022, at 4:39 PM (Dkt. No. 15 at 5-8).

12 36. On September 8, 2022, I received from the process server confirmation in
13 the form of an affidavit that service of the Complaint, Summons, TRO Motion, and the
14 Court's September 6, 2022, Order had been completed in-person at one of the sites listed
15 on the California Secretary of State's website as associated with the company's agent,
16 205 E, 3rd Avenue, Suite 314, San Mateo CA, 94401, on September 7, 2022, at 2:30 PM.
(Ex. E at 1).

17 37. On September 8, 2022, I received from the process server confirmation in
18 the form of an affidavit that service of the Complaint, Summons, TRO Motion, and the
19 Court's September 6, 2022, Order had been completed on Dynadot LLC at the location
20 listed on the California Secretary of State's website as most recently associated with the
21 company's agent, 210 S Ellsworth Ave., Unit 345, San Mateo, CA 94401, via certified
22 mail on September 7, 2022, at 4:39 PM. (Ex. F at 1).

23 38. On September 8, 2022, I received from the process server confirmation in
24 the form of an affidavit that service of the Complaint, Summons, TRO Motion, and the
25 Court's September 6, 2022, Order had been completed on Dynadot LLC by certified mail
26 at PO BOX 607 San Mateo, CA, 94401, on September 7, 2022, at 4:39 PM. (Ex. G at 1).

27 I declare under penalty of perjury under the laws of the United States that the
28

foregoing is true and correct.

Executed in San Francisco, California, on this 8th day of September 2022.

/s/ Jacob Canter